UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD REGION 15

THE GULFPORT STEVEDORING
ASSOCIATION-INTERNATIONAL
LONGSHOREMEN'S ASSOCIATION
CONTAINER ROYALTY PLAN
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and * Cases 15-CA-096939

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TOMMY EVANS, an Individual

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INTERNATIONAL LONGSHOREMEN'S *

ASSOCIATION LOCAL 1303

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and * 15-CB-096934

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TOMMY EVANS, an Individual

MOTION FOR EXTENSION OF TIME TO RESPOND TO GENERAL COUNSEL'S ANSWER

COMES NOW, Respondent, the Gulfport Stevedoring Association-International Longshoremen's Association, Container Royalty Plan (hereinafter the "Plan"), by and through its undersigned counsel, Dummer, Lowery & Savarese, PLLC, and moves to this Honorable Court for an order extending the time for Respondent to respond to General Counsel's Answer by 45 additional days, resulting in Respondent's response due on March 20, 2016. The Respondent would show that this motion is unopposed and the General Counsel has no objection to such extension. The Respondent would further show unto the Court the that the time for responding to General Counsel's Answer has not expired and that this motion is made in good faith and not to cause undue delay.

RESPECTFULLY SUBMITTED, this the 22nd day of January, 2016.

THE GULFPORT STEVEDORING ASSOCIATION-INTERNATIONAL

LONGSHOREMEN'S ASSOCIATION CONTAINER ROYALTY PLAN, Respondent,

DUMMER, LOWRY & SAVARESE, PLLC

BY: <u>/s/ Stephen W. Dummer</u> STEPHEN W. DUMMER (Miss. Bar No. 102341) SCOTT J. HILLERY (Miss. Bar No. 104427)

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CERTIFICATE OF SERVICE

I, the undersigned attorney at law, do hereby certify that I have this date forwarded a true and correct copy of the above and foregoing document via electronic filing, United States Postal Service Postage Prepaid, e-mail and/or facsimile to:

Respondent Union:

Louis L. Robein Kevin R. Mason-Smith 2540 Severn Ave. Suite 400

Metairie, LA 70002

Via email: kmason@ruspclaw.com

Administrative Law Judge:

National Labor Relations Board Division of Judges 401 West Peachtree St. N.W., Suite 1708 Atlanta, GA 30308-3510 **General Counsel:**

M. Kathleen McKinney Kevin McClue Caitlin E. Bergo NLRB – Region 15

600 South Maestri Pl., 7th Floor New Orleans, LA 70130-3413 Via email: Caitlin.bergo@nlrb.gov

National Labor Relations Board

1015 Half Street SE

Washington, D.C. 20570-1000

SO CERTIFIED this the 22nd day of January, 2016.

/s/ Stephen W. Dummer STEPHEN W. DUMMER

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